

St. Louis County (HT)
Gusdorf Corporation

JOHN ASHCROFT
Governor

G. TRACY MEHAN III
Director



STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY
ST. LOUIS REGIONAL OFFICE
10805 Sunset Office Drive, Suite 100
St. Louis, MO 63127-1017
314-822-0101
Fax No. 314-822-0943

Division of Energy
Division of Environmental Quality
Division of Geology and Land Survey
Division of Management Services
Division of Parks, Recreation,
and Historic Preservation

March 2, 1992

Ms. Debbie Dayton
Gusdorf Corporation
11440 Lackland
St. Louis, MO 63146

L.O.W. #92-SL.009

Dear Ms. Dayton:

Enclosed, please find a report of a hazardous waste management inspection conducted on February 7, 1992, by Mr. Dan Bennett of my staff.

Please note that the section titled "UNSATISFACTORY FEATURES" lists violations noted during the inspection, and outlines steps the inspector has determined will correct those violations.

In order to document that corrective actions have been taken, you are requested to submit a written response no later than March 31, 1992. The response should describe the steps taken to correct each of the unsatisfactory features identified. In addition to responding to the unsatisfactory features, also provide the following information:

1. A detailed description of how and where waste rags are generated.
2. Safety data sheets on each product that may come in contact with the rags.
3. A detailed description of the rag laundering process, including if rags are then reused or disposed of.
4. How many pounds of waste rags are generated per month and where the rags disposed of.

Please direct the response to Mr. Bennett. You should also forward a copy of your response and supporting documentation to Mr. Bruce Martin, Chief - Hazardous Waste Enforcement, Waste Management Program, P.O. Box 176, Jefferson City, MO 65102.

It is our purpose by this letter to persuade you to take all necessary actions to comply with the Missouri Hazardous Waste Management Law. Failure to achieve timely resolution of violations may result in the referral of this case for enforcement action by the Waste Management Program.



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R00325137
RCRA RECORDS CENTER

St. Louis County (V)
Gusdorf Corporation
March 2, 1992
Page Two

Should you have any questions, or wish to confer in this matter, please contact Mr. Bennett.

Sincerely,

ST. LOUIS REGIONAL OFFICE



Robert S. P. Eck
Regional Director

RSPE/DB/sh

Enclosure

c: Hazardous Waste Management Program

RESOURCE CONSERVATION AND RECOVERY ACT
AND
MISSOURI HAZARDOUS WASTE MANAGEMENT LAW
COMPLIANCE EVALUATION INSPECTION REPORT

FACILITY

Gusdorf Corporation
11440 Lackland
St. Louis, MO 63146
(314) 567-5249

EPA ID #: MOD006271852
MO ID #: 003306

PARTICIPANTS

Missouri Department of Natural Resources

Mr. Dan Bennett
Environmental Specialist

Gusdorf Corporation

Ms. Debbie Dayton
Environmental Coordinator

Mr. M. Douglas Stebbins
Manufacturing Manager

INTRODUCTION

On February 7, 1992, a Resource Conservation and Recovery Act and Missouri Hazardous Waste Management Compliance Evaluation was conducted by Mr. Dan Bennett, Environmental Specialist, Missouri Department of Natural Resources (MDNR), St. Louis Regional Office (SLRO). The inspection was conducted under authority of the Resource Conservation and Recovery Act of 1976 and Sections 260.375(9) and 260.377 of the Missouri Hazardous Waste Management Law, 1977, as amended.

FACILITY DESCRIPTION

The Gusdorf Corporation manufactures ready to assemble furniture. Wood and particle board are formed into modular furniture through cutting, boring, and laminating of surfaces. The products are finished by staining exposed wood surfaces and oak trim. Furniture is constructed at (10) sites within the facility, then sent to a laminating station or to the finishing area. The lamination process is performed by coating the surface of particle board and the underside of a synthetic cover with an adhesive, then moving the pieces through the laminator. Heat and pressure are applied during the process, fixing the adhesive and joining the two pieces.

Wood staining is performed in an area at the south end of the plant. Stains and varnish are applied by hand, producing numerous dirty rags. The rags are laundered, removing hazardous contaminants, and disposed of at a sanitary landfill. Wastewater is discharged in cooperation with the Metropolitan St. Louis Sewer District (MSD).

Wastes generated are the following:

1. Waste Flammable Liquid (FO03/FO05) from the application and clean-up of wood stains. The solvents used produced a mixture of Methyl Ethyl Ketone, Methyl Isobutyl Ketone, Toluene, Methanol, and Xylene. The generation rate ranges from 150 to 250 gallons per month and is disposed of by energy recovery by Essex Waste Management.
2. Waste corrosive solids (DO02) from clean-up of the laminator. Formaldehyde and Maleic Anhydride are used in the cleaning materials, producing an acidic sludge. The waste is removed for neutralization and disposal by Essex Waste Management. Approximately 800 pounds per month has been generated, but operators have recently completed construction and testing of a primary neutralization unit that will receive waste from laminator clean-up in a closed loop process, allowing for neutralization with lime. After testing, the pH-corrected material is to be discharged in cooperation with the MSD. A Notification of Hazardous Waste Activity form was left at the time of the inspection, so operators could report the change in hazardous waste generation.
3. Waste Flammable Liquid (DO01) from parts cleaning. Two enclosed parts washer units have been obtained from Safety-Kleen. Safety-Kleen services the units about once a month, replacing the dirty naptha-based solvent with new product. About 100 gallons per month is generated, and is removed for distillation and energy recovery by Safety-Kleen.
4. Waste Rags from the application of wood stain. The facility launders the rag prior to disposal in a sanitary landfill. Amounts generated are unknown.

UNSATISFACTORY FEATURES

1. The Personnel Training Plan did not satisfy regulatory requirements, in violation of 10 CSR 25-5.262(1), incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 264.16(d)(1) and (2). Job titles, job descriptions, and names of employees were not included in the Training Plan. Facility operators must review the requirements (copy attached) and submit an updated plan for review.
2. There was no documentation of annual training, in violation of 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(c). Records of employee training were available through 1989, but not since that time. Ms. Dayton asserted that training had been given. The facility must document this training was completed and submit this information to the Department.

3. There was no documentation of the program trainer's qualifications, in violation of 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(a)(2). Ms. Dayton asserted that she had been performing these duties, as the former hazardous waste manager had been reassigned. However, the facility had no documentation of Ms. Dayton's qualifications. The facility must obtain documentation of Ms. Dayton's qualifications and provide this information to the Department.
4. The contingency plan did not contain the name of a primary emergency coordinator, in violation of 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(d). The individual named in the contingency plan is now working at another Gusdorf facility, and would not be available in an emergency. The contingency plan must be updated to include an appropriate primary emergency coordinator, with additional consideration for alternate coordinators and for any other changes in facility operation. A copy of the updated plan must be provided to this office for evaluation. This updated plan must also be sent to all required emergency response facilities. Also provide documentation that this has been done.

Prepared by:

Dan Bennett

Dan Bennett
Environmental Specialist
St. Louis Regional Office

DB/sh

c: HWMP



MISSOURI DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE PROGRAM
LARGE QUANTITY GENERATOR
INSPECTION RECORD AND CHECKLIST

L

LOG-INSP.

FOR FACILITIES THAT GENERATE/ACCUMULATE > 1000 Kg (2,200 lbs. or approximately, 5 drums)

NAME <i>Gusdorf Corporation</i>		DATE <i>Feb 7, 1992</i>	EPA I.D. NUMBER <i>MO D006271852</i>
ADDRESS <i>11440 Lackland</i>		RR NO.	MO I.D. NUMBER <i>003306</i>
CITY <i>St. Louis</i>	NUMBER OF EMPLOYEES <i>150</i>	YEARS AT SITE <i>14</i>	TELEPHONE NUMBER <i>314, 567, 5249</i>
FACILITY REPRESENTATIVE(S), TITLE(S)			

DESCRIPTION OF THE FACILITY'S OPERATIONS AND PLANT.

Manufacture ready to assemble furniture. Wood and particle board are prepared by cutting, boring, and laminating. Surfaces are finished with wood stain. Hazardous waste is generated by cleaning equipment.

WASTE STREAMS

	DESCRIBE EACH WASTE STREAM GENERATED INCLUDING THE PRODUCTION PROCESS	GENERATION RATE	EPA ID NUMBER	DISPOSITION
1.	<i>Waste flammable liquid including toluene, methanol, xylene, methyl ethyl ketone, and methyl isobutyl ketone</i>	<i>150-250 G/mo</i>	<i>F003/F005</i>	<i>Energy recovery</i>
2.	<i>Waste formaldehyde, maleic anhydride</i>	<i>500-600 G/mo</i>	<i>D002</i>	<i>Neutralization</i>
3.	<i>Waste flammable liquid (naptha)</i>	<i>100 G/mo</i>	<i>D001</i>	<i>Resource Recovery</i>
4.				
5.				

CHECK ALL THAT APPLY (Specify if possible)

- | | | |
|---------------------------------------|---|---|
| <input type="checkbox"/> NPDES Permit | <input type="checkbox"/> Lead/Acid Batteries | <input type="checkbox"/> POTW |
| <input type="checkbox"/> Septic Tank | <input type="checkbox"/> H.W. Burner/Blender/Marketer | <input type="checkbox"/> Solid Waste Landfill |
| <input type="checkbox"/> Air Permit | <input type="checkbox"/> Precious Metal Reclamation | <input type="checkbox"/> Waste Water Pretreatment |

A. GENERAL

1. ☒ Registered as a HW Generator - Section 260.380.1 (1) RSMo and 10 CSR 25-5.262(2)(A)
2. ☒ Facility is not a TSD or RR facility - 10 CSR 25-5.262(1) incorporating 40 CFR 261.1
3. ☒ Utilizes a licensed hazardous waste transporter - Section 260.380.1 (5) RSMo
4. ☒ Utilizes authorized HW TSD or RR facility - Section 260.380.1(7) RSMo
5. ☒ Facility does not operate as a TSD - Section 260.390(1) RSMo

COMMENTS

PART 1: WALK-THROUGH INSPECTION**B. PRETRANSPORT, CONTAINERIZATION & STORAGE**

1. ☒ Storage does not exceed 90 days or 180/270 days if facility generates > 1000 Kg/month - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)
2. ☒ Containers in good condition - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.172
3. ☒ Waste compatible with container - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.172
4. ☒ Containers closed in storage - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.173(a)
5. ☒ Containers storing incompatible waste separated or protected from each other by dikes, berms or walls - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.173(b)
6. ☒ Container storage areas have a containment system if holding more than 1000 Kg of liquid hazardous waste - 10 CSR 25-5.262(2)(C)2.B.(I)
7. ☒ Base of containment system is impervious and free of cracks or gaps - 10 CSR 25-5.262(2)(C)2.B.(III)(a).
8. ☒ Containers protected from contact with accumulated liquids - 10 CSR 25-5.262(2)(C)2.B.(III)(b).
9. ☒ Capacity of containment system = 10% of waste volume or volume of largest container, whichever is greater - 10 CSR 25-5.262(2)(C)2.B.(III)(c).
10. ☒ Run-on onto the containment system is prevented or excess capacity is provided - 10 CSR 25-5.262(2)(C)2.B.(III)(d).
11. ☒ Accumulated liquids removed to prevent overflow of containment - 10 CSR 25-5.262(2)(C)2.B.(III)(e).
12. ☒ Containers of ignitable or reactive waste stored >50 ft. from property line (or meet requirements) - 10 CSR 25-5.262(2)(C)5. referencing 40 CFR 265.176 as amended by 10 CSR 25-7.265(2)(I)7. and 8.
13. ☒ Containers clearly marked "hazardous waste" - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(3)
14. ☒ Waste packaged/labeled/marked per DOT during entire on-site storage period - 10 CSR 25-5.262(2)(C)1.
15. ☒ Date of accumulation marked on containers - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(2)
16. ☒ Facility inspected and maintained (weekly) - 10 CSR 25-5.262(2)(C)2.A.(II) referencing 40 CFR 265.174
17. ☒ Daily inspection of areas subject to spills, i.e., waste handling areas - 10 CSR 25-5.262(2)(C)2.A.(II)
18. ☒ Adequate aisle space is available - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.35
19. ☒ Placards available for transporter - 10 CSR 25-5.262(1) incorporating 40 CFR 262.33
20. ☒ "No Smoking" signs conspicuously placed by ignitable or reactive wastes - 10 CSR 25-5.262(2)(C)2.D.(II)
21. ☒ Waste oil containers in good condition, labeled and closed - 10 CSR 25-11.010(3)(C)

COMMENTS

C. SATELLITE ACCUMULATION

1. ☒ Containers kept closed - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.172

COMMENTS

NA

2. ☒ Containers in good condition - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.171
3. ☒ Waste compatible with container - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.172
4. ☒ Quantities accumulated not exceeding 55 gal. (1 quart of acutely-hazardous wastes) - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)
5. ☒ Satellite containers go to storage within 3 days of filling - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(2)
6. ☒ Container marked identifying contents & beginning date - 10 CSR 25-5.262(2)(C)3.
7. ☒ Stored in satellite areas less than 1 year - 10 CSR 25-5.262(2)(C)3.

COMMENTS

D. PREPAREDNESS AND PREVENTION AND EMERGENCY PROCEDURES

1. ☒ Facility operated and maintained to minimize the possibility of an emergency - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.3
2. ☒ Adequate and proper spill control, decontamination and safety equipment available (fire blankets, respirators, SCBA, absorbents, etc.) - 10 CSR 25-5.262 (2)(C)2.E.
3. ☒ Adequate water supply and fire control equipment - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.32(c) & (d)
4. ☒ Device in the hazardous waste operation area capable of summoning emergency assistance - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.34(a)
5. ☒ Telephone or two-way radio on-site and capable of summoning local fire or police department - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.32(b)
6. ☒ Communication and emergency equipment tested and maintained - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.33

COMMENTS

E. LQG TANKS

TANK DESIGNATION	CONTENTS	CAPACITY	CONTAINMENT	AGE
1.				
2.				
3.				
4.				
5.				

1. ☒ Spill prevention controls in place and operating e.g. check valves, dry discount couplings - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.194(b)(1)
2. ☒ Overfill prevention controls in place and operating e.g. high level alarms, automatic feed cutoff, etc. - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.194(b)(2)
3. ☒ Sufficient freeboard in uncovered tanks to prevent overtopping - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.194(b)(3)
4. ☒ Waste or treatment method compatible with tank - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.194(a)
5. ☒ Incompatible wastes not placed in same tank - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.199(a)
6. ☒ Ignitable or reactive wastes rendered safe/protected from sources of ignition or reaction - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.198(a)(1) and (2)
7. ☒ Ignitable or reactive wastes treated/stored in accordance with NFPA's buffer zone requirements - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.198(b)

COMMENTS

NA

8	<input type="checkbox"/> Volatiles with vapor pressure > 76 mm @ 25° C not placed in open tanks - 10 CSR 25-5.262(2)(C)2.D.(i)
9	<input type="checkbox"/> Wastes and residues removed as hazardous waste and tank and equipment decontaminated upon closure - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.197(a)
10	<input type="checkbox"/> Secondary containment system provided for tanks and equipment; installed after July 14, 1986; storing dioxin waste; over 15 years old; of unknown age in facility over 15 years old; repaired, replaced or reinstalled after July 14, 1986 - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(a)
11	<input type="checkbox"/> Secondary containment system constructed of or lined with impervious waste compatible material - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(c)(1)
12	<input type="checkbox"/> Containment system supported by base capable of preventing failure due to settlement, compression or uplift - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(c)(2)
13	<input type="checkbox"/> Containment system provided with a leak detection system capable of detecting a release within 24 hours - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(c)(3)
14	<input type="checkbox"/> Containment system sloped or designed to drain and remove liquids - 10 CSR 25-5.262(2)(C)2.C. referencing 10 CSR 25-5.262(2)(C)2.B.(III)(b)
15	<input type="checkbox"/> Containment system capable of containing 100% of the capacity of the largest tank - 10 CSR 25-5.262(2)(C)2.C. referencing 10 CSR 25-5.262(2)(C)2.B.(III)(c)
16	<input type="checkbox"/> Containment system free of cracks or gaps - 10 CSR 25-5.262(2)(C)2.C. referencing 10 CSR 25-5.262(2)(C)2.B.(III)(a)
17	<input type="checkbox"/> Run-on onto containment system prevented or excess capacity is provided - 10 CSR 25-5.262(2)(C)2.C. referencing 10 CSR 25-5.262(2)(C)2.B.(III)(d)
18	<input type="checkbox"/> Spilled or leaked waste and precipitation removed from secondary containment within 24 hours or as soon as possible - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(c)(4)
19	<input type="checkbox"/> Tanks are clearly labeled or marked "Hazardous Waste" - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(3)
20	<input type="checkbox"/> Daily inspections of overfill/spill control equipment, aboveground portions of tank system, secondary containment, and data gathered from monitoring equipment - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.195(a)
21	<input type="checkbox"/> Inspection log maintained - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.195(c)
22	<input type="checkbox"/> Cathodic protection systems inspected annually, impressed current sources every two months - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.195(b)
23	<input type="checkbox"/> Detailed written assessment by an independent, qualified, professional engineer for tanks installed after July 14, 1986, prepared and on-site - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.191
24	<input type="checkbox"/> Written assessment by an independent, qualified, professional engineer prepared and on-site for tanks lacking secondary containment - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.191
25	<input type="checkbox"/> Leak test, internal inspection or tank integrity exam performed annually and documented, by an independent, qualified, professional engineer for tanks lacking secondary containment - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(i)
26	<input type="checkbox"/> Leak/spill response resulted in: waste flow stopped immediately; waste removal; containment and removal of visible releases to the environment; notification and report; and repair or closure - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.196

COMMENTS

PART 2: RECORDS INSPECTION

F. MANIFESTS

1. ☒ Facility uses manifest system - 260.380.1.(6) RSMo, and 10 CSR 25-5.262(2)(B)
2. ☒ Records maintained for a 3-year period - 10 CSR 25-5.262(1) incorporating 40 CFR 262.40(a)
3. ☒ Generator's MO & EPA I.D. Numbers - 10 CSR 25-5.262(2)(B)
4. ☒ Manifest document, ID and consecutive shipment numbers - 10 CSR 25-5.262(2)(B)2.A.
5. ☒ Generator's name, address and phone number - 10 CSR 25-5.262(2)(B)2.
6. ☒ All transporters' names, phone numbers, MO & EPA I.D.#s, license plate # - 10 CSR 25-5.262(2)(B)2.
7. ☒ Designated facility name, address, phone, MO & EPA I.D. #, - 10 CSR 25-5.262(2)(B)2.
8. ☒ DOT shipping name, Hazard Class and waste I.D. # (RQ - if required) - 10 CSR 25-5.262(2)(B)2.
9. ☒ Containers, quantity and specific gravity designated - 10 CSR 25-5.262(2)(B)2.
10. ☒ Manifest signed and dated - 10 CSR 25-5.262(2)(B)2.
11. ☒ Out of state manifests have all required MO information - 10 CSR 25-5.262(2)(B)4.A.
12. ☒ Manifest continuation sheets are not used - 10 CSR 25-5.262(2)(B)1.
13. ☒ Manifest returned within 35 days - or exception report submitted within 45 days - 10 CSR 25-5.262(2)(D)2.C.
14. ☒ Summary Manifest Reports and manifest copies sent to DNR quarterly - 10 CSR 25-5.262(2)(D)1.

COMMENTS

G. LAND DISPOSAL RESTRICTIONS

1. ☒ Tests waste or uses knowledge of waste to determine if the waste is restricted from land disposal - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)
2. ☒ Dilution of waste to meet LDR treatment standards is not occurring - 10 CSR 25-7.268(1) incorporating 40 CFR 268.3(a)
3. ☒ "Land-Ban" notification/certification, sent with manifests and retained on-site for five years - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)
4. ☒ Notification/certification includes correct EPA Hazardous Waste number, corresponding treatment standards, manifest number, and waste analysis data - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)
5. ☒ Waste analysis plan on-site and utilized if generator treats hazardous waste in tanks or containers to meet LDR treatment standards - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)(4)

COMMENTS

H. PERSONNEL TRAINING

1. ☒ Personnel are trained to respond to emergencies including the use of alarm systems, emergency equipment and contingency plan - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(a)(3).
2. ☒ Employees do not work in unsupervised positions until they have completed the training - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(b)
3. ☐ Training reviewed annually - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(c)
4. ☐ Program director trained in hazardous waste management procedures - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(a)(2)
5. ☒ Personnel training plan on-site - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(d)

COMMENTS

not documented

not documented

<p>6. <input type="checkbox"/> Gives job title, job description and name of employee filling each position - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(d)(1) and (2)</p> <p>7. <input checked="" type="checkbox"/> Written description of introductory and continuing training that will be given to each position - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(d)(3)</p> <p>8. <input type="checkbox"/> Documentation of training completed by personnel - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(d)(4)</p> <p>9. <input type="checkbox"/> Records of current personnel maintained until facility closure, former employee records maintained for at least three years - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(e)</p>	<p align="center">COMMENTS</p>
<p>I. CONTINGENCY PLAN</p>	
<p>1. <input checked="" type="checkbox"/> Contingency plan maintained on-site - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.53(a).</p> <p>2. <input checked="" type="checkbox"/> Plan submitted to local emergency response agencies - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.53(b)</p> <p>3. <input checked="" type="checkbox"/> Emergency coordinator on-site or on call - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.55</p> <p>4. <input checked="" type="checkbox"/> Plan describes actions personnel must take in response to fires, explosions or other releases of hazardous waste - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(a)</p> <p>5. <input checked="" type="checkbox"/> Describes arrangements with emergency response agencies - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(c)</p> <p>6. <input checked="" type="checkbox"/> Lists names, addresses and phone numbers (home and office) of emergency coordinators - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(d)</p> <p>7. <input type="checkbox"/> Primary emergency coordinator designated - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(d)</p> <p>8. <input checked="" type="checkbox"/> List emergency equipment including description, location and capabilities - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(e)</p> <p>9. <input checked="" type="checkbox"/> Evacuation plan, if applicable, designates primary and secondary routes and evacuation signal - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(f)</p>	<p align="center">COMMENTS</p>
<p>J. WASTE OIL</p>	
<p>1. <input type="checkbox"/> Waste oil is managed properly and not disposed of into the environment - 10 CSR 25-11.010(1)(D)</p> <p>2. <input type="checkbox"/> Listed hazardous waste mixed with waste oil is handled as a hazardous waste - 10 CSR 25-11.010(1)(D)</p> <p>3. <input type="checkbox"/> Registered as waste oil generator if gen./accum. 220 lb. - 10 CSR 25-11.010(2)(A)</p> <p>4. <input type="checkbox"/> Written waste oil contract maintained - 10 CSR 25-11.010(4)(C)</p> <p>5. <input type="checkbox"/> Uses a licensed transporter and receiving facility - 10 CSR 25-11.010(4)</p>	<p align="center">COMMENTS</p> <p>NA</p>
<p>K. RESOURCE RECOVERY</p>	
<p>1. <input type="checkbox"/> RC certification for energy recovery or destruction of waste oil or hazardous waste on-site - 10 CSR 25-9.020(3)(E)1.</p> <p>2. <input type="checkbox"/> Facility meets the operating conditions of certification - 10 CSR 25-9.020(3)(E)3.</p> <p>3. <input type="checkbox"/> Facility has submitted a written request and received approval from the DNR for all changes in operation including closure - 10 CSR 25-9.020(3)(E) 1. and 2.</p> <p>4. <input type="checkbox"/> Facility report submitted to DNR quarterly - 10 CSR 25-9.020(3)(E)6. referencing 10 CSR 25-7.264(2)(E)3.</p> <p>5. <input type="checkbox"/> Facility maintains a written operating record - 10 CSR 25-9.020(3)(E)5. referencing 40 CFR 264.73(b)(1) & (2) as modified by 10 CSR 25-7.264(2)(E)2.</p>	<p align="center">COMMENTS</p> <p>NA</p>

6. <input type="checkbox"/> R2 facility uses an adequate sampling and analysis plan to assess incoming shipments - 10 CSR 25-9.020(3)(C)1.	COMMENTS
7. <input type="checkbox"/> R2 facility maintains a daily log of manifest number, wastes received, disposition of waste and corresponding sampling data - 10 CSR 25-9.020(3)(C)2.	
8. <input type="checkbox"/> R2 facility has a written closure plan which meets 40 CFR 264.112 requirements - 10 CSR 25-9.020(3)(C)3.	
9. <input type="checkbox"/> R2 facility provides financial assurance for closure - 10 CSR 25-9.020(3)(C)4.	

CHECKLIST KEY

Check the ☒ if in compliance.

Circle the ☐ if not in compliance and provide comment.

N/A = Not Applicable

A shaded item is a serious deviation from the requirements (Class I violation)

An unshaded item is a significant deviation from the requirements (Class II violation unless conditions warrant Class I)

COMMENTS

INSPECTOR'S SIGNATURE

Dan Bennett

DATE

Feb 7, 1992

INSTRUCTIONS FOR THE COM-
PLETION OF THIS FORM ARE ON A
SEPARATE SHEET.

THIS DOCUMENT MUST BE USED
FOR ALL MISSOURI-DESTINED
SHIPMENTS.

MISSOURI DEPARTMENT OF NATURAL RESOURCES
Division of Environmental Quality
Waste Management Program
P.O. Box 176 Jefferson City, Missouri 65102
314-751-3176

EMERGENCY RESPONSE
U.S. COAST GUARD
1-800-424-8802
CHEM TREC
1-800-424-9300
DEPT. OF NATURAL RESOURCES
314-634-2436

HAZARDOUS WASTE MANIFEST

Form Approved OMB No 2050-0039, Expires 9-30-91

Print or type (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS
WASTE MANIFEST

1. Generator's US EPA ID No.

M P D P P 6 2 7 1 8 5 2 0 0 3 4

Manifest
Document No.

9106

2. Page 1
of 1

Information in the shaded areas
is required by State law.

3. Generator's Name and Mailing Address

Gusdorf Corp.
11440 Lackland Road
St. Louis, MO 63146

4. Generator's Phone (314) 567-5249

5. Transporter 1 Company Name

Triad Transport, Inc.

6. US EPA ID Number

P K D 9 8 1 5 8 8 7 9 1

7. Transporter 2 Company Name

8. US EPA ID Number

9. Designated Facility Name and Site Address

Essex Waste Management
Rt. #1, Box 159
Kingsville, MO 64061

10. US EPA ID Number

M O D 9 8 0 9 6 2 8 4 9

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

a. RQ, Waste Corrosive Liquid, N.O.S., (Maleic
Anhydride/Lime) Corrosive Liquid UN1760

12. Containers
Number Type

0480 DM

13. Total
Quantity

02648

14. Unit
Wt/Vol.

G

b. RQ, Waste Paint, Flammable Liquid
UN1263 (D001/F803/F005)

0110 DM

00605

G

15. Special Handling Instructions and Additional Information If undeliverable return to generator. In case of
emergency call CHEMTREC 1-800-424-9300. Emergency Response Guidebook #60

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked,
and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and applicable state regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable
and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment;
OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method available to me that I can afford.

Printed/Typed Name

Deborah Dayton

Signature

Deborah Dayton

Month Day Year

11/21/91

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

REN GRAGG

Signature

Ren Gragg

Month Day Year

12/21/91

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

Donnie E. Willcockson

Signature

Donnie E. Willcockson

Month Day Year

12/21/91

SAFETY-KLEEN 105 PARTS WASHING SOLVENT

MATERIAL SAFETY DATA SHEET

SECTION I -- PRODUCT INFORMATION

Safety-Kleen Corporation - 777 Big Timber Road - Elgin, IL 60123
For Product/Sales Information Call 708/697-8460

EMERGENCY TELEPHONE

These numbers are for emergency use only. If you desire non-emergency information about this product, please call the telephone number listed above.

MEDICAL:

800/942-5969 or 312/942-5969
RUSH POISON CONTROL CENTER
CHICAGO, ILLINOIS (24 HOURS)

TRANSPORTATION:

800/424-9300
CHEMTREC

IDENTITY (TRADE NAME): SAFETY-KLEEN 105 PARTS WASHING SOLVENT

SYNONYMS: PETROLEUM DISTILLATES, PETROLEUM NAPHTHA, MINERAL SPIRITS, STODDARD SOLVENT

SK PART NUMBER: 6617

FAMILY/CHEMICAL NAME: HYDROCARBON SOLVENT

PRODUCT USAGE: SOLVENT FOR CLEANING AND DEGREASING PARTS

SECTION II -- HAZARDOUS COMPONENTS

NAME	SYNONYM	%	CAS NO.	OSHA PEL (ppm)	ACGIH TLV (ppm)
Parts Washer Solvent (consists predominantly of C9-C13 hydrocarbon)	Mineral Spirits	(Typical % by Wt.)			
C9-C13 Saturated Hydrocarbon		85	64741-41-9	100 (Stoddard Solvent)	100 (Stoddard Solvent)
*Toluene		0.5	108-88-3	100 150 STEL	100 150 STEL
*Xylene		1.0	1330-20-7	100 150 STEL	100 150 STEL
*Ethyl Benzene	D018	0.5	100-41-4	100 Skin 125 STEL	100 125 STEL
C8+ Aromatics		12.0	Mixture	N/E	N/E
Chlorinated Solvents		(Max 1% by Wt.)			
*1,1,1 Trichloroethane		<0.5	71-55-6	350 450 STEL	350 450 STEL
*Tetrachloroethylene	D039	<0.5	127-18-4	25	50 200 STEL

N/E = Not Established

* See Section X - Other Regulatory Information

SECTION III -- PHYSICAL DATA

PHYSICAL STATE, APPEARANCE AND ODOR:

Combustible liquid - clear, green, with characteristic hydrocarbon odor.

BOILING POINT:

300° - 429° F

EVAPORATION RATE: (Butyl Acetate = 1) 0.1
PERCENT VOLATILE: 99.9%
VAPOR DENSITY: 4.9 (Air = 1)
VAPOR PRESSURE: 2 mm of Hg at 68° F
SOLUBILITY IN WATER: Negligible
pH: Not Applicable
SPECIFIC GRAVITY: 0.77 to 0.80
MOLECULAR WEIGHT: Approximately 142
VOLATILE ORGANIC COMPOUNDS: 795 g/L

SECTION IV -- FIRE AND EXPLOSION HAZARD DATA

FLASH POINT: 105° F (SETA)
AUTOIGNITION TEMPERATURE: 473° F
CONDITIONS OF FLAMMABILITY: Materials must be moderately heated before ignition can occur.
FLAMMABLE LIMITS IN AIR - LOWER: 0.7% **UPPER:** 6.0%
EXTINGUISHING MEDIA: Carbon dioxide, foam, dry chemical, water (mist only).
FIRE FIGHTING PROCEDURES -- SPECIAL: NFPA 704 Rating 2-2-0

Keep storage tanks cool with water spray. Use self-contained breathing apparatus (SCBA).

UNUSUAL FIRE AND EXPLOSION HAZARDS:

Decomposition and combustion products may be toxic. Heated tanks may rupture, explode or be thrown into the air. Vapors are heavier than air and may travel great distances to ignition source and flashback.

HAZARDOUS COMBUSTION PRODUCTS:

Thermal decomposition and burning may produce carbon monoxide.

SECTION V -- REACTIVITY DATA

STABILITY: Normally stable even under fire exposure conditions and is not reactive with water. Normal firefighting procedures may be used.
INCOMPATIBILITY (CONDITIONS TO AVOID): Strong oxidizing agents (e.g. chlorine, peroxides, strong acids).
HAZARDOUS POLYMERIZATION: Not known to occur under normal conditions.
HAZARDOUS DECOMPOSITION PRODUCTS: Normally none; however, incomplete burning may yield carbon monoxide.

SECTION VI -- HEALTH HAZARD DATA

PRIMARY ROUTES OF EXPOSURE: Skin and eye contact; inhalation.

HEALTH HAZARD DATA/SIGNS AND SYMPTOMS OF EXPOSURE:

ACUTE: *Skin:* Prolonged or repeated contact tends to remove skin oils, possibly leading to irritation and dermatitis. No significant skin absorption hazard.

Eyes: Contact may cause slight to moderate irritation. High vapor concentrations (> 500 ppm) are irritating to the eyes.

Inhalation: High concentrations of vapor or mist may be irritating to the respiratory tract, cause headaches, dizziness, nausea, impaired coordination, anesthesia and may have other central nervous system effects.

Ingestion: Low order of acute oral toxicity. May cause irritation of the throat, nausea, vomiting and symptoms of central nervous system depression. Aspiration into the lungs during ingestion or vomiting may cause mild to severe pulmonary injury and possibly death.

CHRONIC: Prolonged and/or repeated contact may cause drying and cracking of the skin or dermatitis.

OTHER POTENTIAL HEALTH HAZARDS:

The impurities that may be present are not expected to add significantly to the effects of exposure.

**MEDICAL CONDITIONS
AGGRAVATED BY EXPOSURE:**

Individuals with pre-existing central nervous system dysfunction may have increased susceptibility to the effects of exposure. Contact with skin may aggravate pre-existing dermatitis.

CARCINOGENICITY: Tetrachloroethylene is listed by IARC and NTP as a suspected carcinogen. Studies indicate that Ethyl Benzene and 1,1,1 Trichloroethane are experimental teratogens.

SECTION VII -- EMERGENCY AND FIRST AID PROCEDURES

- EYES:** For direct contact, flush eyes with water for 15 minutes lifting upper and lower lids occasionally. Consult physician if irritation or pain persists. If irritation or redness from exposure to vapors or mists develop, move victim away from exposure into fresh air.
- SKIN:** Remove contaminated clothing. Wash skin twice with soap and water. If irritation develops and persists, consult a physician.
- INGESTION:** If conscious, dilute with 4 to 8 ounces of water and seek immediate medical attention. DO NOT induce vomiting.
- INHALATION:** Remove to fresh air immediately. Use oxygen if there is difficulty breathing or artificial respiration if respiration has stopped. Do not leave victim unattended. Seek immediate medical attention if necessary.

SECTION VIII -- PRECAUTIONS FOR SAFE USE AND HANDLING

- SPILL
PROCEDURES:** Remove all ignition sources. Ventilate area and avoid breathing vapors. For large spills, isolate area and deny entry. If possible, contain as a liquid for possible re-refining. Absorb onto sand or other absorbent material. Shovel into closable container for disposal. Wear protective equipment specified below. Contain away from surface waters and sewers.
- WASTE DISPOSAL
METHODS:** Dispose in accordance with Federal, State, and local regulations. Contact Safety-Kleen regarding recycling.
- HANDLING
PRECAUTIONS:** Avoid contact with eyes, skin or clothing. Use in well ventilated area and avoid breathing vapors or mists. Keep away from heat, sparks and open flames.
- SHIPPING AND STORING
PRECAUTIONS:** Empty product containers may contain product residue. Do not pressurize, cut, heat, weld, grind or expose containers to flame or other sources of ignition. Keep container tightly closed when not in use and during transport.

**PERSONAL
HYGIENE:**

Use good personal hygiene. Wash thoroughly with soap and water after handling and before eating, drinking or using tobacco products. Launder contaminated clothing and clean protective equipment before reuse.

SECTION IX - CONTROL MEASURES**VENTILATION:**

Provide local exhaust or general dilution ventilation as determined necessary to maintain concentrations of vapors or mists below applicable exposure limits. Where explosive mixtures may be present, systems safe for such locations should be used.

**PROTECTIVE
GLOVES:**

Use nitrile or neoprene gloves to prevent contact with skin.

**EYE
PROTECTION:**

Where there is likelihood of spill or splash, wear chemical goggles or faceshield. Contact lenses should not be worn.

**RESPIRATORY
PROTECTION:**

Use NIOSH-approved respiratory protective equipment when concentration of vapors or mists exceeds applicable exposure limit. Depending on the airborne concentration, use a respirator or gas mask with appropriate cartridges and canisters (for organic vapor with mist prefilter). A self-contained breathing apparatus (SCBA) is required for large spills and emergencies. Selection and use of respiratory protective equipment should be in accordance with OSHA General Industry Standard 29 CFR 1910.134 - Respiratory Protection.

**OTHER PROTECTIVE
EQUIPMENT:**

Wear solvent-resistant boots, apron or other protective clothing where spills and splashes are possible. A source of clean water should be available in work areas for flushing the eyes and skin.

SECTION X -- OTHER REGULATORY INFORMATION**DOT PROPER SHIPPING NAME:**

Petroleum Naphtha

DOT CLASS:

Combustible Liquid

DOT NUMBER:

UN 1255

SARA TITLE III:

Product contains a toxic chemical or chemicals subject to the reporting requirements of Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 and 40 CFR Part 372. Toxic constituents are listed with an asterisk in Section II of this Material Safety Data Sheet.

Product poses the following physical and/or health hazard(s) as defined in 40 CFR 370.3 (Sections 311, 312 of SARA Title III):

Immediate (Acute) Health Hazard
Delayed (Chronic) Health Hazard
Fire Hazard

SECTION XI - PREPARATION INFORMATION**PREPARED BY:**

SK Product Review Committee

FORM NO. 900-14-001

ORIGINAL ISSUE DATE: July 20, 1989

REVISED: March 12, 1990 SUPERSEDES: July 20, 1989

User assumes all risks incident to the use of this product. To the best of our knowledge, the information contained herein is accurate. However, Safety-Kleen assumes no liability whatsoever for the accuracy or completeness of the information contained herein. No representations or warranties, either express or implied, or merchantability, fitness for a particular purpose or of any other nature are made hereunder with respect to information or the product to which information refers. The data contained on this sheet applies to the material as supplied to the user.